

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-20074-CR-MOORE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERICA ROMAN MORALES,

Defendant.

UNOPPOSED MOTION TO CONTINUE TRIAL DATE

The Defendant, ERICA ROMAN MORALES, by and through undersigned counsel, hereby files this Motion to Continue the Trial in this matter which is currently set for the two-week period beginning on April 10, 2023, and as grounds, therefore, would state the following:

1. On February 28, 2023, the defendant was arraigned on a two (2) count indictment charging her with One (1) count of Importation of a Controlled Substance in violation of Title 18 U.S.C. §952 (b) and One count of Possession with Intent to Distribute a Controlled Substance in violation of Title 18 U.S.C. §841(a)(1).

2. Undersigned counsel has received the government's initial discovery response. Additional time is required to review the discovery with the defendant. The discovery review has been delayed because Ms. Roman resides in Puerto Rico.

3. Undersigned counsel is requesting an additional thirty (30) days to review the discovery with Ms. Roman. Moreover, the additional time will give the parties the time needed to

finalize a plea agreement in this case. Undersigned counsel anticipates that this matter will be resolved by way of a plea.

4. There has been no prior continuance requested by the defendants in this case.

5. Ms. Roman agrees that any delay resulting from this request is excludable for Speedy Trial purposes. A copy of Ms. Roman's signed waiver of her speedy trial rights is attached hereto as Exhibit "A."

6. Undersigned counsel has spoken to AUSA Mitchell Hyman, who advises that the government has no objection to the defendant's request for a continuance.

WHEREFORE Defendant, ERICA ROMAN MORALES, respectfully requests this Motion be granted and that trial in this matter be continued for thirty (30) days.

Respectfully submitted,

BY: /s/ Frank Schwartz
Frank Schwartz, Esquire
Bar No. 120250

FRANK SCHWARTZ, P.A.
100 Biscayne Blvd., Suite 1300
Miami, Florida 33132
TEL: (305) 379-5661
FAX: (305) 379-5687
Frank@FSchwartzLaw.net

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2023, the undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF and the same was delivered to all parties in this case in the same manner.

BY: /s/ Frank Schwartz
Frank Schwartz, Esquire

EXHIBIT

“A”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 23-CR-20074-KMM

UNITED STATES OF AMERICA,

v.

ERICA ROMAN MORALES,

Defendant.

DEFENDANT'S SPEEDY TRIAL WAIVER

I, ERICA ROMAN MORALES, the Defendant in the above-captioned case number, after consulting with my attorney and being fully advised of my right to a speedy trial within seventy (70) days from the date of my arraignment pursuant to Title 18 U.S.C. §3161(c)(1), hereby waive my rights to a speedy trial because it is in my best interest. I enter this waiver freely, voluntarily, and with the advice of good and competent counsel.



ERICA ROMAN MORALES
Defendant

Respectfully submitted,

By: /s/ Frank Schwartz
FRANK SCHWARTZ, ESQUIRE
Florida Bar No. 120250

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